



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

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October 25, 2004

Ref: 8EPR-SR

Mr. Greg Wennerberg  
PO Box 2645  
Great Falls, MT 59403

RE: Waste from Burlington Northern Santa Fe cleanup in Libby, Montana

Dear Mr. Wennerberg:

Burlington Northern Santa Fe (BNSF) is conducting a cleanup of their rail yard at the Libby Asbestos Superfund Site in Libby, MT. This cleanup is being conducted under agreement with EPA using authority granted in the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), also known as Superfund.

BNSF seeks to dispose of rail ties from the Site. The ties are being removed so that contaminated soil below them can be excavated. The soils are contaminated with amphibole asbestos (the only contaminant of concern at the Libby Asbestos Site) and will be disposed of in Libby at the EPA-operated asbestos landfill cell. The rail ties are being carefully pressure washed after removal and stock-piled in a clean area for future disposal or re-use.

The purpose of pressure washing the ties is to remove residual asbestos prior to movement or disposal. Our cleanup work in Libby has shown that pressure washing can successfully remove asbestos contamination from hard, semi-porous surfaces such as wood. In fact, we use this method to clean certain contaminated items owned by residents in Libby and return them as "clean." As such, the rail ties were sampled by BNSF post-cleaning, and the results came back non-detect for Libby Amphibole asbestos, therefore, the ties need not be treated as CERCLA waste. The CERCLA Off-Site rule does not apply to materials removed from a CERCLA site that EPA does not consider contaminated. Of course, all other pertinent and applicable regulations must still be followed. If you have any questions, please contact me directly at (303) 312-6748.

Sincerely,

Jim Christiansen  
Remedial Project Manager